

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANATOLIY MIKITYUK, MITCH
TALLUNGAN, and MICHAEL ESQUIBEL,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

CISION US INC. and CISION LTD.,

Defendants.

No. 21-cv-00510-LJL

**NOTICE OF PLAINTIFFS' MOTION
FOR COURT-AUTHORIZED NOTICE
PURSUANT TO 29 U.S.C. § 216(B)**

Oral Argument Requested

For the reasons set forth in Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Court-Authorized Notice Pursuant to 29 U.S.C. § 216(b), and the Declaration of Melissa L. Stewart in Support of Plaintiffs' Motion and exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) Authorizing the issuance of notice to Collective Members;
- (2) Ordering Defendants to produce a computer-readable data file containing the names, last known mailing addresses, last known telephone numbers, last known personal email addresses, last four digits of Collective Members' Social Security numbers (for those notices returned undeliverable), and work locations and dates of employment at each location for all Collective Members; and
- (3) Approving Plaintiffs' Proposed Notice and the plan for its distribution.

A proposed order is attached to this Motion.

Dated: February 16, 2021
New York, NY

Respectfully submitted,

By: s/ Melissa L. Stewart
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*Attorneys for Plaintiffs, the Putative Collective,
and the Putative Classes*

**Pro hac vice* motion forthcoming

CERTIFICATION OF SERVICE

I hereby certify that on February 16, 2021, a true and correct copy of the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to counsel of record in this matter.

I further certify that a copy of the foregoing was also served upon the defendant not registered to receive electronic filings by Federal Express, postage prepaid, as follows:

Cision Ltd.
130 E. Randolph Drive, 7th Fl.
Chicago, IL 60601

By: /s/ Melissa L. Stewart
Melissa L. Stewart